

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

GARY WASHINGTON,

Plaintiff

v.

BALTIMORE POLICE DEPARTMENT, *et al.*,

Defendants

Case No. 1:19-cv-02473-SAG

Judge Stephanie Gallagher

JURY TRIAL DEMANDED

PLAINTIFF'S LOCAL RULE 104.7 CERTIFICATION

Plaintiff, Gary Washington, by and through his counsel, certifies his compliance with Local Rule 104.7 in relation to his discovery dispute with the Officer Defendants. In support of this certification, Plaintiff states as follows:

1. On September 14, 2021, the Officer Defendants provided notice of an intent to subpoena third-party witness, Norman Cook's prison phone call logs, phone records, and recorded phone calls. On the same day, Plaintiff objected in writing to the issuance of the subpoena. Ex. 1 (Email to Officer Defendants, Sept. 14, 2021)
2. On September 17, 2021, at 10:00am, counsel for the Officer Defendants, Jasmine Jasmine England-Caesar and Shneur Nathan, and Plaintiff's counsel, Renee Spence, attended a telephonic conference to confer about the subpoena.
3. The parties continued to confer via email on September 17, 2021, and September 24, 2021. Ex. 2. (Emails between the Parties, Sept. 17, 2021 and September 24, 2021).

4. The Officer Defendants agreed to temporarily limit the subpoena to six years but would not agree to any further narrowing of the subpoena. Despite sincere attempts to resolve their differences, however, the parties were unable to reach a resolution as to specificity of the Officer Defendants' subpoena for Norman Cook's prison calls, and Plaintiff now seeks the Court's assistance. Ex. 3 (Plaintiff's Motion for a Protective order).

Respectfully submitted,

GARY WASHINGTON

By: /s/ Roshna Bala Keen

One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Roshna Bala Keen, an attorney, hereby certify that I filed the foregoing document via the Court's CM/ECF system on October 12, 2021, and thereby served a copy on all counsel of record.

/s/ Roshna Bala Keen

One of Plaintiffs' Attorneys